

COMMENTS ON THE

INTERIM FINAL RULE: Health Information Technology:
Initial Set of Standards, Implementation Specifications, and Certification
Criteria for Electronic Health Record Technology

PRIVACY AND SECURITY WORKGROUP REVIEW
[NAME OF REVIEWER]

Question #	IFR Page	COMMENT SUMMARY	DISCUSSION AND RECOMMENDATIONS
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1. Is the general approach of certifying “EHR Modules” and “Complete EHRs” reasonable and implementable? Are the definitions reasonable? (general)

IFR 1	Page Ref	[Comment Summary]	[Discussion and Recommendation]
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2. Are the privacy and security certification criteria adopted (see Table 1, p 61 and Regulation §170.302(o-v) on pp 127-128) reasonable and sufficient to adequately protect health information within the Stage 1 meaningful-use timeframe? (general)

IFR 2	Page Ref	[Comment Summary]	[Discussion and Recommendation]
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3. Are any of the privacy and security certification criteria adopted (see Table 1, p 61 and Regulation §170.302(o-v) on pp 127-128) insufficiently specific to be used to test and certify Complete EHRs or EHR Modules, with reasonable assurance that the technology will effectively support the delivery of health care as well as the achievement of Stage 1 meaningful use? (solicitation p 62)

IFR 3	Page Ref	[Comment Summary]	[Discussion and Recommendation]
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4. Are the privacy and security standards adopted (see Table 2B, p 85 Regulation §170.210(a-e) on pp 119-120) reasonable and sufficient to adequately protect electronic health information within the Stage 1 meaningful use timeframe? (general)

IFR 4	Page Ref	[Comment Summary]	[Discussion and Recommendation]
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5. Should the domain name service, directory access, and consistent time, or any other function or service, be reconsidered for inclusion as a required capability for Certified EHR Technology? (solicitation p 83)

IFR 5	Page Ref	[Comment Summary]	[Discussion and Recommendation]
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6. Is the functional standard adopted for accounting for disclosures for treatment, payment, and healthcare operations (see Table 2B, p 85 and discussion on pp 90-93; and Regulation §170.210(e) on 120) reasonable and technically feasible? What is the technical feasibility of collecting other data elements, including reason for the disclosure and to whom the disclosure was made? (solicitation p 92)

IFR 6	Page Ref	[Comment Summary]	[Discussion and Recommendation]
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7. Do you perceive any gaps in the IFR with respect to privacy and security standards, implementation specifications, and certification criteria? (general)

IFR 7	Page Ref	[Comment Summary]	[Discussion and Recommendation]
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